

FILED

Clerk
District Court

APR 14 2006

For The Northern Mariana Islands

By _____
(Deputy Clerk)

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Attorneys for Defendants Justice Alexandro C. Castro,
Justice John A. Manglona, and Timothy H. Bellas

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Plaintiff,

vs.

COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS,
NICOLE C. FORELLI, WILLIAM C.
BUSH, D. DOUGLAS COTTON, L.
DAVID SOSEBEE, ANDREW
CLAYTON, UNKNOWN AND
UNNAMED PERSONS IN THE CNMI
OFFICE OF THE ATTORNEY
GENERAL, ALEXANDRO C. CASTRO,
JOHN A. MANGLONA, TIMOTHY H.
BELLAS, PAMELA BROWN, ROBERT
BISOM, AND JAY H. SORENSEN,

Defendants.

CIVIL ACTION NO. 05-0027

**MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF *EX
PARTE* MOTION EXTENDING TIME
UNDER LOCAL RULE 7.1.h.3(b) AND
FEDERAL RULES OF CIVIL
PROCEDURE 6(b); APPLICATION FOR
INCREASE OF TIME UNDER LOCAL
RULE 7.1.h.2**

Defendants Alexandro C. Castro, John A. Manglona, and Timothy H. Bellas ("Judicial Defendants") request that the court allow them additional time, until June 19, 2006, to file a dispositive motion or responsive pleading to the Second Amended Complaint filed by the Plaintiff in this matter. The Defendants' *ex parte* motion is supported by the Memorandum of Points and Authorities which follows, all matters of record herein, and such arguments as may be adduced at a hearing hereon.

1 Plaintiff Bradshaw mailed a copy of the Second Amended Complaint to counsel for the
2 Judicial Defendants at counsel's Saipan Office address. Counsel received the Second Amended
3 Complaint, sent in the mail to the Saipan Office, on April 13, 2005. The pleading was thereafter
4 sent by counsel's Saipan Office via overnight mail to Guam, where counsel is presently working,
5 and was not actually received by counsel until April 14, 2006. Upon review of the Second
6 Amended Complaint, it appears that the filing deadline for a responsive pleading is April 15,
7 2006, which falls on a Saturday thus extending the deadline to April 17, 2006. The Second
8 Amended Complaint is seventy five (75) pages in length and contains numerous attachments.
9 The Second Amended Complaint alleges a total of seventeen (17) claims.


10 Due to the voluminous nature of the pleadings, and the delayed receipt of the Second
11 Amended Complaint in the mail, the Judicial Defendants require additional time to properly
12 review and compose an appropriate response to the pleading.

13 For the reasons stated herein, the Judicial Defendants respectfully request that the Court
14 grant Defendants' *Ex Parte Motion Extending Time Under Local Rule 7.1.h.3(b) and Federal
15 Rules of Civil Procedure 6(b); Application for Increase of Time Under Local Rule 7.1.h.2.*

16 Respectfully submitted,

17 **CIVILLE & TANG**

18 DATED: April 14, 2006

19 By: 
20 **G. PATRICK CIVILLE**
21 *Attorneys for Defendants*
22 *Justice Alexandro C. Castro,*
23 *Justice John A. Manglona, and*
24 *Timothy H. Bellas*